

Bell Communications Research, Inc. ("Bellcore"), the owner of CCSCIS.

3. Footnote 24 of the July 19 Order states that "since, in the present proceeding, two LECs were able to develop costs for 800 data base service without [CCSCIS or similar model], LECs do not need to rely on such a model for this service." That statement is not valid with respect to BellSouth. BellSouth has relied upon CCSCIS to develop investments for the 800 data base service. I am not aware of any other means or process for developing those investments that would enable BellSouth to develop reasonable costs for 800 data base vertical services for this proceeding and that would not also involve applications of proprietary data and models.

4. Paragraph 29 of the July 19 Order directs any LEC that relies upon CCSCIS or a similar model in this proceeding "to disclose those models on the record." Bellcore imposes limits on the use of CCSCIS by BellSouth and has established severe restrictions on the disclosure of information contained in or pertaining to the CCSCIS model. BellSouth has complied with those restrictions. BellSouth cannot comply with those restrictions and also "disclose" CCSCIS "on the record."

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 28, 1993.

H. L. F. N. D.

United States of America
Federal Communications Commission

In the Matter of)
) CC Docket No. 93-129
800 Data Base Access Tariffs and the)
800 Service Management System Tariff)

Declaration of Curt Hopfinger

1. I am District Manager-Product Development Costs & Regulatory for Southwestern Bell Telephone Company. Southwestern Bell Telephone Company is a local exchange carrier ("LEC") and a participant in the above-captioned proceeding. I provide this declaration to address statements contained in Common Carrier Bureau's Order Designating Issues for Investigation dated July 19, 1993 ("the July 19 Order"). I am personally familiar with the facts related here, and am competent to testify regarding them if called upon to do so.

2. The Common Channel Signalling Cost Information System ("CCSCIS") is a computer model used by Southwestern Bell Telephone Company, a CCSCIS licensee, to calculate and apportion the shared SS7 investments used by 800 data base and other SS7 based services. A key feature of CCSCIS is its incorporation of current cost data from five equipment vendors (Northern Telecom, DSC Communications, Digital Equipment Corporation, Ericsson and AT&T). This enables Southwestern Bell Telephone Company to develop accurate and up-to-date service specific investments for purposes of this and other proceedings. The vendor data is proprietary and the CCSCIS model is both a trade secret and proprietary, according to Bell Communications Research, Inc. ("Bellcore") the owner of

3. Footnote 24 of the July 19 Order states that "since, in the present proceeding, two LECs were able to develop costs for 800 data base service without [CCSCIS or similar model], LECs do not need to rely on such a model for this service." That statement is not valid with respect to Southwestern Bell Telephone Company. Southwestern Bell Telephone Company has relied upon CCSCIS to develop investments for the 800 data base service. I am not aware of any other means or process for developing those investments that would enable Southwestern Bell Telephone Company to develop reasonable costs for 800 data base vertical services for this proceeding and that would not also involve applications of proprietary data and models.

4. Paragraph 29 of the July 19 Order directs any LEC that relies upon CCSCIS or a similar model in this proceeding "to disclose those models on the record." Bellcore imposes limits on the use of CCSCIS by Southwestern Bell Telephone Company and has established severe restrictions on the disclosure of information contained in or pertaining to the CCSCIS model. Southwestern Bell Telephone Company has complied with those restrictions. Southwestern Bell Telephone Company cannot comply with those restrictions and also "disclose" CCSCIS "on the record."

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 27, 1993.

A handwritten signature in cursive script, appearing to read "L. L. L. L. L.", written in dark ink.

United States of America
Federal Communications Commission

In the Matter of

800 Data Base Access Tariffs and the
800 Service Management System Tariff

cc Docket No. 93-129

Declaration of James J. Lechtenberg

1. I am Director of Marketing and Product Information for Pacific Bell..

Pacific is a local exchange carrier ("LEC") and a participant in the above-captioned proceeding. I provide this declaration to address statements contained in Common Carrier Bureau's Order Designating Issues for Investigation dated July 19, 1993 ("the July 19 Order"). I am personally familiar with the facts related here, and am competent to testify regarding them if called upon to do so.

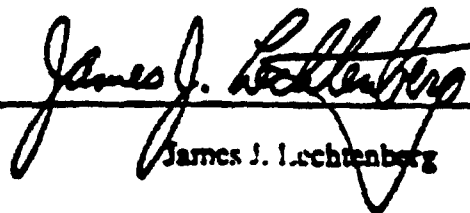
2. The Common Channel Signaling Cost Information System ("CCSCIS") is a computer model used by Pacific, a CCSCIS licensee, to calculate and apportion the shared SS7 investments used by 800 data base and other SS7 based services. A key feature of CCSCIS is its incorporation of current cost data from five equipment vendors (Northern Telecom, DSC Communications, Digital Equipment Corporation, Ericsson and AT&T). This enables Pacific and other users of CCSCIS to develop accurate and up-to-date service specific investments for purposes of this and other proceedings. The vendor data is proprietary and the CCSCIS model is both a trade secret and proprietary, according to Bell Communications Research, Inc. ("Bellcore"), the owner of CCSCIS.

3. Footnote 24 of the July 19 Order states that "since, in the present proceeding, two LECs were able to develop costs for 800 data base service without (CCSCIS or similar model), LECs do not need to rely on such a model for this service." That statement is not valid with respect to Pacific. Pacific has relied upon CCSCIS to develop investments for the 800 data base vertical services. I am not aware of any better means or process for developing bottoms-up investments that would enable Pacific to develop reasonable costs for 800 data base vertical services for this proceeding and that would not also involve applications of proprietary data and models.

4. Paragraph 29 of the July 19 Order directs any LEC that relies upon CCSCIS or a similar model in this proceeding "to disclose those models on the record." Bellcore imposes limits on the use of CCSCIS by Pacific and has established severe restrictions on the disclosure of information contained in or pertaining to the CCSCIS model. Pacific has complied with those restrictions. Pacific cannot comply with those restrictions and also "disclose" CCSCIS "on the record".

Pursuant to 28 U. S. C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 28, 1993


James J. Lechtenberg

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
800 Data Base Access Tariffs) CC Docket No. 93-129
and the 800 Service Management)
System Tariff)

Declaration of Francis J. Murphy

1. I am Associate Director-Interstate Access & Carrier Services for Telesector Resources Group, Inc., a wholly owned subsidiary of New York Telephone Company and New England Telephone and Telegraph Company (the "NYNEX Telephone Companies" or "NTCs"). The NYNEX Telephone Companies are local exchange carriers ("LECs") and participants in the above-captioned proceeding. I provide this declaration to address statements contained in Common Carrier Bureau's Order Designating Issues for Investigation dated July 19, 1993 ("the July 19 Order"). I am personally familiar with the facts related here, and am competent to testify regarding them if called upon to do so.

2. The Common Channel Signalling Cost Information System ("CCSCIS") is a computer model used by the NTCs, as CCSCIS licensees, to calculate and apportion the shared SS7 investments used by 800 data base and other SS7 based services. A key feature of CCSCIS is its incorporation of

current cost data from five equipment vendors (Northern Telecom, DSC Communications, Digital Equipment Corporation, Ericsson and AT&T). This enables the NTCs and other users of CCSCIS to develop accurate and up-to-date service specific investments for purposes of this and other proceedings. The vendor data is proprietary and the CCSCIS model is both a trade secret and proprietary, according to Bell Communications Research, Inc. ("Bellcore"), the owner of CCSCIS.

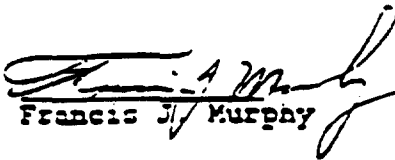
3. Footnote 24 of the July 19 Order states that "since, in the present proceeding, two LECs were able to develop costs for 800 data base service without [CCSCIS or similar model], LECs do not need to rely on such a model for this service." That statement is not valid with respect to the NTCs. The NTCs have relied upon CCSCIS to develop investments for the 800 data base service. I am not aware of any other means or process for developing those investments that would enable the NTCs to develop reasonable costs for 800 data base vertical services for this proceeding and that would not also involve applications of proprietary data and models.

4. Paragraph 29 of the July 19 Order directs any LEC that relies upon CCSCIS or a similar model in this proceeding "to disclose those models on the record." Bellcore imposes limits on the use of CCSCIS by the NTCs and has established severe restrictions on the disclosure of information contained in or pertaining to the CCSCIS model. The NTCs have complied with those restrictions. The NTCs cannot comply with those restrictions and also "disclose" CCSCIS "on the record."

- 3 -

Pursuant to 28 U.S.C. § 1746, I declare under penalty
of perjury that the foregoing is true and correct.

Executed on July 28, 1993.


Francis J. Murphy

**United States of America
Federal Communications Commission**

In the Matter of)

800 Data Base Access Tariffs and the)
800 Service Management System Tariff)

CC Docket No. 93-129

Declaration of Robert E. Sigmon

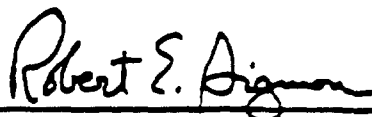
1. I am Vice President - Regulatory Affairs for Cincinnati Bell Telephone Company ("CBT"). CBT is a local exchange carrier ("LEC") and a participant in the above-captioned proceeding. I provide this declaration to address statements contained in the Common Carrier Bureau's Order Designating Issues for Investigation released July 19, 1993 ("the July 19 Order"). I am personally familiar with the facts related herein, and am competent to testify regarding them if called upon to do so.

2. The Common Channel Signalling Cost Information System ("CCSCIS") is a computer model used by CBT, a CCSCIS licensee, to calculate and apportion the shared SS7 investments used by 800 data base and other SS7-based services. A key feature of CCSCIS is its incorporation of current cost data from five equipment vendors (Northern Telecom, DSC Communications, Digital Equipment Corporation, Ericsson and AT&T). This enables CBT and other users of CCSCIS to develop accurate and up-to-date service specific investments for purposes of this and other proceedings. The vendor data is proprietary and the CCSCIS model is both a trade secret and proprietary, according to Bell Communications Research, Inc. ("Bellcore"), the owner of CCSCIS.

3. Footnote 24 of the July 19 Order states that "since, in the present proceeding, two LECs were able to develop costs for 800 data base service without [CCSCIS or similar model], LECs do not need to rely exclusively on such a model for this service." That statement is not valid with respect to CBT. CBT has relied upon CCSCIS to develop investments for the 800 data base service. I am not aware of any other means or process for developing those investments that would enable CBT to develop reasonable costs for 800 data base vertical services for this proceeding and that would not also involve applications of proprietary data and models.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 28, 1993.



Robert E. Sigmon

UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of) CC Docket No. 93-129
800 Data Base Access Tariffs)
and the 800 Service Management)
System Tariff)

Declaration of Martin W. Clift

1. I am Director of Regulatory Matters for The Southern New England Telephone Company (SNET). SNET is a local exchange carrier ("LEC") and a participant in the above-captioned proceeding. I provide this declaration to address statements contained in Common Carrier Bureau's Order Designating Issues for Investigation dated July 19, 1993 ("the July 19 Order"). I am personally familiar with the facts related here, and am competent to testify regarding them if called upon to do so.

2. The Common Channel Signaling Cost Information System ("CCSCIS") is a computer model used by SNET, a CCSCIS licensee, to calculate and apportion the shared SS7 investments used by 800 data base and other SS7 based services. A key feature of CCSCIS is its incorporation of current cost data from five equipment vendors (Northern Telecom, DSC Communications, Digital Equipment Corporation, Ericsson and AT&T). This enables SNET and other users of CCSCIS to develop accurate and up-to-date service specific investments for purposes of this and other proceedings. In

- 2 -

addition to the vendor data, the model also includes SNET specific information that is proprietary, confidential, and which constitutes trade secret information. To the best of my knowledge SNET has never publicly disclosed this information.

3. Footnote 24 of the July 19 Order stated that "since, in the present proceeding, two LECs were able to develop costs for 800 data base service without (CCSCIS or similar model), LECs do not need to rely on such a model for this service." That statement is not valid with respect to SNET. SNET has relied upon CCSCIS to develop investments for the 800 data base service. I am not aware of any other means or process for developing those investments that would enable SNET to develop reasonable costs for 800 data base vertical services for this proceeding and that would not also involve applications of proprietary data and models.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true and correct.
Executed on July 29, 1993.

Martin W. Ciftci
(Declarant)

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

-----)
In the Matter of)

800 Data Base Access Tariffs and the) CC Docket No. 93-129
800 Service Management System Tariff)
-----)

Declaration of Kenneth A. Moreland

1. I am Kenneth A. Moreland, Staff Administrator - New Services Pricing, GTE Telephone Operations, 600 Hidden Ridge, HQE02D12, Irving, Texas 75038. I provide this declaration to address statements contained in the Order Designating Issues for Investigation released by the Acting Chief, Common Carrier Bureau, July 19, 1993 ("the July 19 Order"), 800 Data Base Access Tariffs, CC Docket No. 93-129, particularly at footnote 24. I am personally familiar with the facts related herein, and am competent to testify as to those facts if called on to do so.

2. I developed the cost analysis and pricing to support the 800 Data Base tariff filings on March 1, 1993 (Transmittal Nos. 775 and 36) of the GTE and Contel telephone companies. The following procedures were carried out utilizing a costing model developed by GTE:

A. I identified equipment involved in providing 800 Data Base service, including equipment already owned or leased by the company as well as equipment planned to be purchased or leased.

B. I identified the vendor's price to GTE for equipment

calculated based on tariffed rate elements under the tariffs of interexchange carriers. Pricing for equipment was furnished by the equipment vendors with the understanding that contract details concerning pricing and sizing parameters would be held proprietary.

C. Based on GTE's forecasted usage of the equipment involved, I either directly assigned the anticipated aggregate equipment costs to 800 Data Base service when it was planned to be dedicated to that service, or otherwise allocated the cost among services in accordance with anticipated relative usage for each unit of equipment.

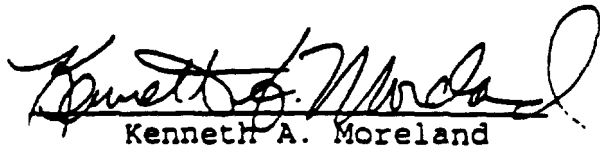
D. Based on GTE's forecasts of the anticipated volume of SS7 Message Signaling Units (the lowest measurable common denominator for SS7 traffic), I calculated "Total Capitalized Cost" and "Total Expensed Cost" for an 800 Data Base query as shown on Exhibit 6 in GTE's March 1 tariff filing.

3. In carrying out the foregoing, I did not use the Common Channel Signaling Cost Information System ("CCSCIS") or the Switching Cost Information System ("SCIS"), both developed by Bellcore.

4. GTE's costing model is used to develop SS7-related costs for other services in addition to 800 Data Base costs. Embodied within this model is intellectual property and technical information, including some which constitute trade secrets. This information is highly sensitive and proprietary not only to GTE

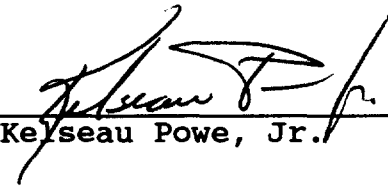
Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 28, 1993.


Kenneth A. Moreland

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 2nd day of March, 1994, I have caused a copy of the foregoing **APPLICATION FOR REVIEW** to be served via first-class United States Mail, postage prepaid, upon the persons listed on the attached service list.


Kelseau Powe, Jr.

***Via Hand-Delivery**

(CC93-129/BM/lh)

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